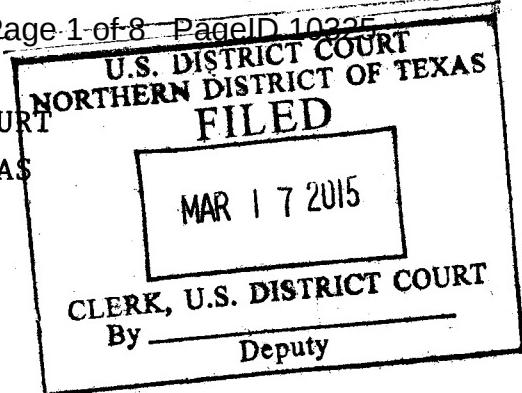


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

REGINALD BROWN,

:

Movant/Defendant,

:

vs.

:

UNITED STATES OF AMERICA,

:

Respondent/Plaintiff.

:

Case No. 4:11-cr-00096-Y(23)

:

MOTION FOR APPOINTMENT OF COUNSEL AND

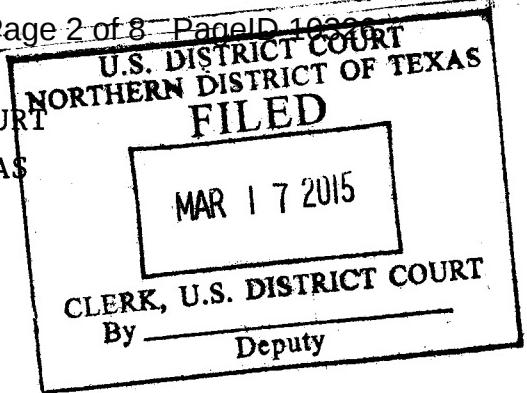
MOTION FOR CONSIDERATION OF SENTENCE REDUCTION

28 U.S.C. § 3582(c)(2) & Amendment 782

COMES NOW, Reginald Brown ("Movant"), pro se, respectfully requesting this Honorable Court to grant this Motion under the provisions of 28 U.S.C. § 3582(c)(2) and Amendment 782.

Effective November 1, 2014, the United States Sentencing Commission enacted Amendment 782 to the United States Sentencing Guidelines. Amendment 782 reduces the base offense levels assigned to particular controlled substance quantities in the Drug Quantity Table, U.S.S.G. § 2D1.1(c) and thus operates to reduce the applicable guideline ranges. The Commission has deemed Amendment 782 to apply retroactively pursuant to U.S.S.G. § 1B1.10(d).

On April 9, 2012, this District Court imposed a sentence judgment under 21:846 & 841(A)(1) & (B)(1)(A) on the basis of Conspiracy to possess with intent to distribute a controlled substance to serve a prison term of 188 months with 60 months of supervision. See BOP Sentence Monitoring Computation Data documentation attached hereto (2 pages).

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

REGINALD BROWN, :
Movant/Defendant, :
vs. : Case No. 4:11-cr-0096-Y(23)
UNITED STATES OF AMERICA, :
Respondent/Plaintiff. :
:

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MOTION FOR CONSIDERATION OF SENTENCE REDUCTION
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Relief Sought

Movant was sentenced under the drug guideline, U.S.S.G. § 2D1.1 and is eligible for reduction of his imposed sentence in accordance to the provisions under Amendment 782.

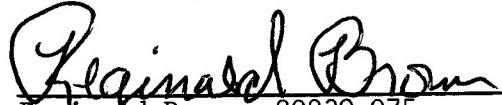
Movant has no substantial income, owns no property, has no assets, and has no monies due to him from any source. As a result, he is unable to retain counsel, pay for counsel, or pay any incidental expenses which may be incurred in the pursuit of relief under Amendment 782.

Movant asserts that he is not a trained Attorney and seeks the professional wisdom and advice of counsel to obtain all relief to which he is entitled under the retroactive application of Amendment 782.

WHEREFORE, Movant respectfully requests this Honorable Court to appoint the Federal Public Defender's Office for their expert assistance in properly evaluating and recalculating Movant's sentence term pursuant to the provisions under Amendment 782 and filing any and all necessary motions or pleadings to obtain relief thereby.

Dated this 12 day of MARCH, 2015.

Respectfully Submitted,



Reginald Brown, 20839-075
Federal Correctional Complex - Low
P.O. Box 5000
Yazoo City, Mississippi 39194

Attachments:

1. BOP Sentence Monitoring Computation Data form (2 pgs)

Certificate of Mailing

I, Reginald Brown, declare and certify under the penalty of perjury that a true and correct copy of this Motion was sent first-class U.S. mail, regular mail, postage prepaid, to the following party(s):

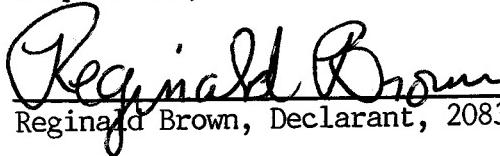
U.S. Attorney's Office
Northern District of Texas
Earle Cabell Federal Building
1100 Commerce Street, 3rd Floor
Dallas, Texas 75242-1699

-And-

Federal Public Defender Office
Northern District of Texas
A. Maceo Smith Federal Building
525 South Griffin Street, Suite 629
Dallas, Texas 75202

Dated this 12 day of March, 2015.

Respectfully Submitted,



Reginald Brown, Declarant, 20839-075

YAZGY 540*23 *
PAGE 001 *

SENTENCE MONITORING
COMPUTATION DATA
AS OF 03-04-2015

* 03-04-2015
* 11:45:50

REGNO.: 20839-075 NAME: BROWN, REGINALD

FBI NO.....: 555938KA5 DATE OF BIRTH: 04-30-1970 AGE: 44
ARS1.....: YAZ/A-DES QUARTERS....: A15-047L
UNIT.....: ALPHA DETAINERS.....: NO NOTIFICATIONS: NO

HOME DETENTION ELIGIBILITY DATE: 10-06-2024

THE FOLLOWING SENTENCE DATA IS FOR THE INMATE'S CURRENT COMMITMENT.
THE INMATE IS PROJECTED FOR RELEASE: 04-06-2025 VIA GCT REL

-----COURT JUDGMENT/WARRANT NO: 010 -----

COURT OF JURISDICTION.....: TEXAS, NORTHERN DISTRICT
DOCKET NUMBER.....: 4:11-CR-0096-Y(23)
JUDGE.....: MEANS
DATE SENTENCED/PROBATION IMPOSED: 04-09-2012
DATE COMMITTED.....: 05-21-2012
HOW COMMITTED.....: US DISTRICT COURT COMMITMENT
PROBATION IMPOSED.....: NO

	FELONY ASSESS	MISDMNR ASSESS	FINES	COSTS
NON-COMMITTED.:	\$100.00	\$00.00	\$00.00	\$00.00

RESTITUTION...: PROPERTY: YES SERVICES: NO AMOUNT: \$00.00

-----COURT OBLIGATION NO: 010 -----

OFFENSE CODE....: 391
OFF/CHG: 21:846 & 841(A)(1) & (B)(1)(A) CONSPIRACY TO POSSESS WITH
INTENT TO DISTRIBUTE A CONTROLLED SUBSTANCE, A CLASS A FELONY

SENTENCE PROCEDURE.....: 3559 PLRA SENTENCE
SENTENCE IMPOSED/TIME TO SERVE.: 188 MONTHS
TERM OF SUPERVISION.....: 5 YEARS
DATE OF OFFENSE.....: 07-12-2011

G0002 MORE PAGES TO FOLLOW . . .

YAZGY 540*23 *
PAGE 002 OF 002 *

SENTENCE MONITORING
COMPUTATION DATA
AS OF 03-04-2015

* 03-04-2015
* 11:45:50

REGNO.: 20839-075 NAME: BROWN, REGINALD

-----CURRENT COMPUTATION NO: 010 -----

COMPUTATION 010 WAS LAST UPDATED ON 05-04-2012 AT DSC AUTOMATICALLY
COMPUTATION CERTIFIED ON 05-10-2012 BY DESIG/SENTENCE COMPUTATION CTR

THE FOLLOWING JUDGMENTS, WARRANTS AND OBLIGATIONS ARE INCLUDED IN
CURRENT COMPUTATION 010: 010 010

DATE COMPUTATION BEGAN.....: 04-09-2012
TOTAL TERM IN EFFECT.....: 188 MONTHS
TOTAL TERM IN EFFECT CONVERTED...: 15 YEARS 8 MONTHS
EARLIEST DATE OF OFFENSE.....: 07-12-2011

JAIL CREDIT.....	FROM DATE	THRU DATE
05-03-2011	05-06-2011	
08-18-2011	04-08-2012	

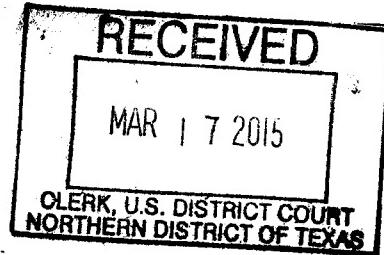
TOTAL PRIOR CREDIT TIME.....: 239
TOTAL INOPERATIVE TIME.....: 0
TOTAL GCT EARNED AND PROJECTED...: 737
TOTAL GCT EARNED.....: 162
STATUTORY RELEASE DATE PROJECTED: 04-06-2025
EXPIRATION FULL TERM DATE.....: 04-13-2027
TIME SERVED.....: 3 YEARS 6 MONTHS 21 DAYS
PERCENTAGE OF FULL TERM SERVED...: 22.7

PROJECTED SATISFACTION DATE.....: 04-06-2025
PROJECTED SATISFACTION METHOD...: GCT REL

G0000 TRANSACTION SUCCESSFULLY COMPLETED

Reginald Brown
Fed. Reg. # 20839-075
Federal Correctional Complex - Low
P.O. Box 5000
Yazoo City, Mississippi 39194

March 12, 2015



Ms. Karen Mitchell, Clerk of Court
United States District Court
Northern District of Texas
U.S. Courthouse
1100 Commerce Street, Room 1452
Dallas, Texas 75242

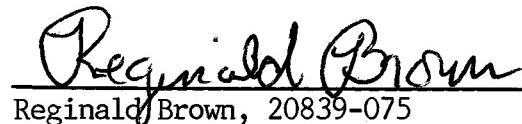
Re: Case No. 4:11-cr-0096-Y(23)
Re: Motion

Dear Ms. Mitchell,

Please file the enclosed Motion for Appointment of Counsel and Motion for Consideration of sentence reduction. Also, please forward an electronic copy to the U.S. Attorney's Office as well as the Federal Public Defender's Office at your earliest convenience.

Thank you kindly for your help in this matter.

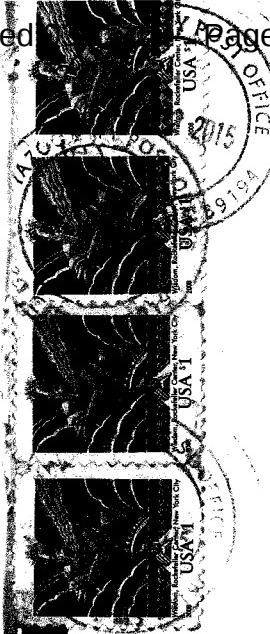
With Kindest Regards,



Reginald Brown, 20839-075

Enclosures:

1. Motion (3 pages)
2. Copy of BOP Sentence Monitoring Computation Data forms (2 pages)



CERTIFIED MAIL™

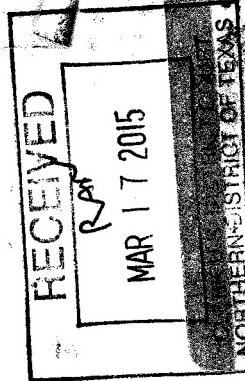
Reginald Brown, 20839-075
Federal Correctional Complex - Low
P.O. Box 5000
Yazoo City, Mississippi 39194



RECEIVED

0000 0000 0000 4266

RJF
MAR 17 2015



United States District Court
Northern District of Texas
U.S. Court house
1100 Commerce Street, Room 1452
Dallas, Texas 75242

Attn: Clerk of Court

1000

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